

**REQUIRED STATEMENT
TO ACCOMPANY ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) James K Allen and Rosiland D Allen Case No. 19-08666 Chapter 13

All Cases: Name of Moving Creditor Ally Financial Date Case Filed March 27, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
a. ☐ Home _____
b. ☒ Car Year, Make and Model 2019 KIA SPORTAGEVIN:KNDPM3AC5K7567635
c. ☐ Other _____

2. Balance Owed as of Petition Date \$ 29,040.25.
Total of all other Liens against Collateral \$ _____

3. Attach a payment history, or list the months post-petition for which full payment from the debtor was not
Received: February through June 2019

4. Estimated Value of Collateral (must be supplied in all cases) \$24,853.00

5. Default
a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
b. ☒ Post-Petition Default
☒ On direct payments to the moving creditor
Number of months February through June 2019 Amount \$ 3,450.18, which amount
includes attorney fees and costs of \$681
☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations
a. ☒ Lack of Adequate Protection § 362 (d)(1)
i. ☒ No insurance _____
ii. ☐ Taxes unpaid _____ Amount \$ _____
iii. ☒ Rapidly depreciating asset _____
iv. ☐ Other (describe) _____
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
c. Other "Cause" § 362 (d)(1)
i. ☐ Bad Faith _____
ii. ☐ Multiple filings _____
iii. ☐ Other (describe) _____
d. Debtor's Statement of Intention regarding the Collateral
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: July 13, 2019
(Rev. 6/1/09)

/s/ James M. Philbrick
Counsel for Ally Financial